

SBA Shipyard Site PRP Group

Jennings, LA

May 17, 2018

Submittal sent via email to torres.michael@epa.gov

Michael Torres
Remedial Project Manager
US EPA Region 6, Superfund Division (6SF-RL)
1445 Ross Avenue, Suite 1200
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RE SBA Shipyard Superfund Site – Submittal of the Revised Remedial Investigation Work Plan and Supporting Documents

Dear Mr. Torres,

EHS Support, LLC (EHS Support), on behalf of the SBA Shipyard PRP Group (SBA Group), is providing the enclosed revised Remedial Investigation (RI) Work Plan (Work Plan) for the SBA Shipyard Superfund Site located in Jennings, Jefferson Davis Parish, Louisiana (**Figure 1**) (Site). The Work Plan was developed in accordance with the provisions of the Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigation/Feasibility Study (RI/FS) between the United States Environmental Protection Agency (USEPA) – Region 6 and the SBA Group dated October 25, 2016.

The Work Plan has been revised to address USEPA's comment letter, dated February 9, 2018, as well as to incorporate revisions discussed during the in-person meeting at the Louisiana Department of Environmental Quality (LDEQ) office on March 22, 2018 and subsequent discussions via telephone on April 12, 2018.

To facilitate the review of the revised document, we are submitting a tracked-changes version of the text (electronically) in addition to the required hard copy document. The following bulleted list summarizes the key changes in the document and provides reference to the applicable comment number from the February 2018 USEPA comment letter:

- **Updated terminology:** Per our discussions, we have replaced the terms "areas of concern" (AOC) and "areas of interest" (AOI) with "investigation area of concern" (IAC) and "investigation area of interest" (IAI), respectively. These changes were made throughout the document.
- **Section 2.3 Site Impacts:** The bullet list of key constituents of potential concern (COPCs) was modified to clarify that limited semi-volatile organic compound (SVOCs) constituents previously detected at the Site other than polycyclic aromatic hydrocarbons (PAHs) were from historical waste samples and not from environmental media samples (e.g., soil, sediment, etc.).
- **Section 3.2.1 Systematic Sampling and Section 3.2.1.1 Northern Property Systematic VOC Sampling Program:** A detailed discussion of the soil sampling approach for the Northern Property has been added to the text. This discussion is consistent with conversations with both USEPA and LDEQ and details the agreed-upon photoionization detector (PID) screening methodology, and the basis for determining volatile organic compound (VOC) sample collection on the Northern Property. These revisions were also made in response to the USEPA/LDEQ Comment #1 and Comment #2 from the February 2018 comment letter.



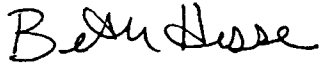
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- **Section 3.2.2 Judgmental Sampling and Section 3.2.2.1 Northern Property Judgmental Sampling Program:** A detailed discussion of the judgmental sampling program was added to the text, per discussions with USEPA and LDEQ. These revisions were also made in response to the USEPA/LDEQ Comment #3 from the February 2018 comment letter.
- **Section 3.2.4 Asphaltic Surficial Material Characterization:** Per discussions with USEPA and LDEQ, the samples of this material will be analyzed for VOCs, SVOCs, Total Petroleum Hydrocarbons (TPH) – Volatile Petroleum Hydrocarbons (VPH), and TPH – Extractable Petroleum Hydrocarbons (EPH). The revised text deletes the reference to the PAH suite of analytes. These revisions were made in response to the USEPA/LDEQ Comment #4 from the February 2018 comment letter.
- **Section 3.3.1.1 [Sediment] Sampling Design and Section 3.3.1.2 [Sediment] Sampling Methods:** Redundant text has been removed from these sections. Additional text has been added to provide detailed guidance on the recommended sampling intervals, per discussions with USEPA and LDEQ.
- **Section 3.3.2 Surface Water:** The text has been revised to clarify that samples will be collected for analysis for VOC, PAHs, metals and geochemical parameters. The previous version had not specified the agreed-upon PAH subset of SVOC analysis. Furthermore, *in situ* water quality parameters were revised to include salinity. This revision was made in response to the USEPA/LDEQ Comment #6 from the February 2018 comment letter.
- **Section 3.4.1 Monitoring Well Installation:** Additional language was added detailing the PID screening methodology and the potential co-location of monitoring wells with judgmental soil sample locations. These revisions were made in response to the USEPA/LDEQ Comment #7 from the February 2018 comment letter.
- **Section 3.4.3 Groundwater Gauging and Sampling:** The text has been revised to state that samples will be collected for analysis for VOC, PAHs, metals (unfiltered), total dissolved solids (TDS), and geochemical and physical parameters. The previous version had not specified the agreed-upon PAH subset of SVOC analysis. TDS was added to the groundwater sampling program so that groundwater may be classified in accordance with LDEQ's Risk Evaluation/Corrective Action Program (RECAP). This revision was made in response to the USEPA/LDEQ Comment #9 from the February 2018 comment letter.
- **Section 3.5.2 Sediment and Surface Water:** The revised text states that samples will be collected for analysis for VOC, PAHs, metals and geochemical parameters. The previous version had not specified the agreed-upon PAH subset of SVOC analysis.
- USEPA/LDEQ comment #8 from the February 2018 comment letter was discussed during the in-person meeting and did not require edits to the work plan. **Section 3.5.1 Surface Soils (Comment #10)** The text has been modified to specify the agreed-upon PAH subset of SVOC analysis in background soil sample locations. This revision was made in accordance with discussion held during the March meeting and to address USEPA/LDEQ Comment #10 from the February 2018 comment letter.
- **Section 3.7.1.4 Toxicity Assessment (Comment #11)** Per correspondence with USEPA and LDEQ on May 23, 2017 and on April 3, 2018, this comment has been resolved without necessitating further revision to the RI Work Plan.

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Should you have any questions or require additional information please feel free to call or email Scott Lindenmuth (312-882-3705, scott.lindenmuth@ehs-support.com) We look forward to your feedback on the Work Plan and supporting documents

Respectfully,



Beth C. Hesse
SBA Group Project Coordinator

Cc SBA Shipyard PRP Group
Mr Tommy Doran, Louisiana Department of Environmental Quality
Mr Scott Lindenmuth, EHS Support